

IN THE US BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Thomas James Edward Soul,

Case No. 1:19-bk-03353-HWV

Debtor

Chapter 13

MOTION TO RESTORE AUTOMATIC STAY

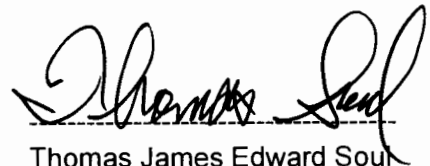
Debtor requests that Automatic Stay be restored to the pending case, which is under review for conversion to a Chapter 7 case, to be heard in this Court on October 14, 2020. There is a pending Writ of Possession which is dated for October 16, 2020.

The possession order would require Debtor to leave his residence, and perhaps have additional consequences. Debtor respectfully requests that the Court restore Automatic Stay to enable him to remain in the property until he can secure alternate living quarters.

Debtor is willing to compensate the party in terms of rent. However, they have thus far insisted upon his removal from the property. Removing Debtor would subject him to potential harm, injury and dangerous conditions.

THEREFORE, Debtor prays that this Honorable Court will grant the relief requested and any other additional protection that may be allowable.

Respectfully submitted,



Thomas James Edward Soul
Pro-se Debtor
92 B Cemetery Avenue
Stewartstown, PA 17363

FILED
HARRISBURG, PA
2020 OCT -9 PM 3:32
U.S. BANKRUPTCY COURT
CWB

IN THE US BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Thomas James Edward Soul,

Case No. 1:19-bk-03353-HWV

Debtor

Chapter 13

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 9th, 2020, a copy of the foregoing Motion To Restore Automatic Stay was made available through electronic means or mailed First-Class U.S. Mail to the following:

Toyota Financial Services
6565 Headquarters Drive
Attn: Corp. Tax Dept. W2-4A
Plano, TX 75024-5965

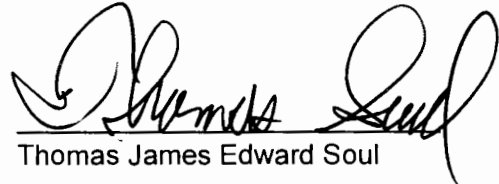
PNC Bank
P.O. Box 1820
Dayton, OH 45401-1820

Nelnet US Dept. of Education
TPD Servicing
P.O. Box 87130
Lincoln, NE 68501-7130

Pennsylvania Department of Revenue
Bankruptcy Division
P.O. Box 280946
Harrisburg, PA 17128-0946

Rand A. Feder
Morris and Vedder, LLP
32 South Duke Street
P.O. Box 149
York, PA 17405-0149

James Warmbrodt
701 Market Street, Suite 5000
Philadelphia, PA 19106-1541



Thomas James Edward Soul

SHERIFF'S OFFICE OF YORK COUNTY

Richard P Keuerleber
Sheriff



Christopher A. Ferro, Esq.
Solicitor

Steven Diehl
Chief Deputy, Operations

Richard E Rice, II
Chief Deputy, Administration

BP REAL ESTATE INVESTMENT GROUP, LP

VS.

THOMAS JAMES EDWARD SOUL, A/K/A THOMAS SOUL,
A/K/A THOMAS J.E. SOUL
THOMAS SOUL
THOMAS JAMES EDWARD SOUL

IN THE COURT OF COMMON PLEAS
OF YORK COUNTY
PENNSYLVANIA

WRIT OF POSSESSION
2020-SU-000121

NOTICE OF POSSESSION

NOTICE IS HEREBY GIVEN THAT BY VIRTUE OF A WRIT OF POSSESSION ISSUED OUT OF THE COURT OF COMMON PLEAS OF YORK COUNTY TO ME BE DIRECTED, POSSESSION OF THE FOLLOWING DESCRIBED PROPERTY:

92 B CEMETERY AVENUE, STEWARTSTOWN, PA 17363

IS TO BE DELIVERED TO:

BP REAL ESTATE INVESTMENT GROUP, LP

ON: Friday, October 16, 2020 2:00:00 PM

DATE: 9/24/2020

OFFICE OF THE SHERIFF
YORK COUNTY JUDICIAL CENTER
45 NORTH GEORGE STREET
YORK, PA 17401

A handwritten signature in black ink, appearing to read 'Richard P Keuerleber', written over a horizontal line.

Richard P Keuerleber, Sheriff
County of York

By:

A handwritten signature in black ink, appearing to read 'Sage Lear', written over a horizontal line.

Sage Lear, Deputy

IN THE COURT OF COMMON PLEAS OF YORK COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

BP Real Estate Investment Group, LP, : No. 2020-SU-000121
Plaintiff :
v. : ACTION IN EJECTMENT
Thomas James Edward Soul, : 92B Cemetery Avenue
a/k/a Thomas Soul, a/k/a Thomas J.E. Soul, : Stewartstown, York County, PA
Defendant : UPI No. 86-000-BK-0050-D0-000000

WRIT OF POSSESSION

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF YORK :
TO THE SHERIFF OF YORK COUNTY :

To satisfy the Judgment for possession in the above-captioned matter, you are directed to deliver possession of the following described property to the Plaintiff, **BP Real Estate Investment Group, LP:**

92B CEMETERY AVENUE, STEWARTSTOWN, PENNSYLVANIA 17363-4021

Respectfully Submitted:
BLAKE & SCHANBACHER LAW, LLC

12TH day of August, 2020

By:

Kurt A. Blake, Esquire
Attorney ID No. 68791
29 East Philadelphia Street
York, Pennsylvania 17401
(717) 848-3078, ext. 106
Kurt@Palitigators.com

Allison Blew

(SEAL OF THE COURT)

Date: 8-12-20 *Prothy Fees* \$ 455.77

PROTHONOTARY

DEPUTY



BLAKE &
CHANBACHER LAW, L.L.C.
ATTORNEYS AND
COUNSELLORS AT LAW
29 East Philadelphia Street
York, Pennsylvania 17401
Phone 717.848.3078
Fax 717.848.2777
www.PAlitigators.com

BP REAL ESTATE INVESTMENT GROUP, LP

vs.

THOMAS JAMES EDWARD SOUL, A/K/A THOMAS SOUL, A/K/A THOMAS J.E. SOUL,
THOMAS SOUL, THOMAS JAMES EDWARD SOUL

Case Number
2020-SU-000121

SHERIFF'S RETURN OF SERVICE

09/24/2020 01:31 PM - POSTED ONE TRUE AND ATTESTED COPY OF THE WITHIN WRIT OF POSSESSION UPON REAL ESTATE LOCATED AT 92 B CEMETERY AVENUE, STEWARTSTOWN, PA 17363 WITH SHERIFF'S NOTICE INDICATING POSSESSION TO BE DELIVERED TO THE PLAINTIFF ON FRIDAY, OCTOBER 16, 2020 AT 2:00 PM.